Case 06-10725-gwz Doc 4964 Entered 10/11/07 14:09:18 Page 1 of 2 LEWIS ROCA E-Filed on 10/11/07 1 3993 Howard Hughes Parkway, Suite 600 Las Vegas, NV 89169-0961 Facsimile (702) 949-8321 2 Telephone (702) 949-8320 40 North Central Avenue, Suite 1900 3 Phoenix, Arizona 85004-4429 Susan M. Freeman AZ State Bar No. 004199 4 Email: sfreeman@lrlaw.com Rob Charles NV State Bar No. 006593 Email: rcharles@lrlaw.com 5 John Hinderaker AZ State Bar No. 018024 Email: jhinderaker@lrlaw.com 6 Attorneys for USACM Liquidating Trust 7 UNITED STATES BANKRUPTCY COURT 8 DISTRICT OF NEVADA 9 In re: Case No. BK-S-06-10725-LBR 10 Case No. BK-S-06-10726-LBR USA COMMERCIAL MORTGAGE Case No. BK-S-06-10727-LBR 11 COMPANY, Case No. BK-S-06-10728-LBR Case No. BK-S-06-10729-LBR USA CAPITAL REALTY ADVISORS, 12 LLC, CHAPTER 11 13 USA CAPITAL DIVERSIFIED TRUST Jointly Administered Under Case No. 14 DEED FUND, LLC. BK-S-06-10725 LBR USA CAPITAL FIRST TRUST DEED 15 STIPULATION CONTINUING FUND, LLC, HEARING ON OBJECTION TO 16 **CLAIM OF COPPER SAGE** USA SECURITIES, LLC. COMMERCIAL CENTER LLC 17 Debtors. (CLAIM No. 792) 18 Affects: Date of Hearing: October 15, 2007 □All Debtors Time of Hearing: 9:30 a.m. 19 ■ USA Commercial Mortgage Company ☐ USA Capital Realty Advisors, LLC New Date of Hearing: December 14, 2007 20 ☐ USA Capital Diversified Trust Deed Fund, LLC Time of Hearing: 9:30 a.m. ☐ USA Capital First Trust Deed Fund, LLC 21 □ USA Securities, LLC 22 USACM Liquidating Trust (the "USACM Trust"), by and through its counsel, 23 Lewis and Roca LLP, and Copper Sage Commercial Center LLC ("Copper Sage") by and 24 through its counsel, Susan Williams Scann of Deaner, Deaner, Scann, Malan & Larsen 25 stipulate: 26

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- USA Commercial Mortgage Company filed an objection to Claim No. 792 1. of Copper Sage [DE 3077] (the "Objection").
  - 2. The Objection is set for status hearing on October 15, 2007 at 9:30 a.m.
- 3. Litigation in Nevada state court that will impact the value of Copper Sage has been ongoing, but is winding down. Copper Sage hopes to soon be in a position to value its claim and discuss settlement with the USACM Liquidating Trust.
- 4. Accordingly, the parties agree to continue the status hearing on the Objection from November 15, 2007 at 9:30 a.m. to December 14, 2007 at 9:30 a.m.
  - 5. The parties submit a stipulated order for the Court's convenience.

RESPECTFULLY SUBMITTED October 11, 2007.

## LEWIS AND ROCA LLP

By: <u>/s/ RC (#6</u>593)

Susan M. Freeman, AZ 4199 (pro hac vice)

Rob Charles, NV 6593

John Hinderaker, AZ 18024 (pro hac vice)

Counsel for USACM Liquidating Trust

-and-

## DEANER, DEANER, SCANN, MALAN & LARSEN

Susan Williams Scann (NV 000776)

720 S Fourth Street, Suite 300

Las Vegas, NV 89101

Telephone: 702-382-6911

E-Mail: sscann@deanerlaw.com

Attorneys for Copper Sage Commercial Center

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